COMMONWEALTH OF KENTUCKY FRANKLIN CIRCUIT COURT DIVISION II CIVIL ACTION NO. 06-CI-00114

OFFICE OF FINANCIAL INSTITUTIONS

**PETITIONER** 

VS.

JEWELL ROBBINS, ET AL.

RESPONDENTS

ANSWERS TO INTERROGATORIES

Comes the Plaintiff, by Counsel, pursuant to Rule 33 and for her Answers to Interrogatories states as follows:

INTERROGATORY NO. 1: Identify by name of bank or other financial institution, address and account number any and all depository accounts in any bank or financial institution opened or utilized by you or any person on your behalf since June 7, 2007 to present.

ANSWER: None.

INTERROGATORY NO. 2: State whether there have been any changes in investors' ownership interests or S/A shares from June 7, 2007 to present, and if your answer is "Yes," identify and explain in detail all such changes and include in your answer all relevant dates, names, addresses, telephone numbers, percentage of interest, and the nature of any such changes.

Exhibit A

ANSWER: As we discussed before, the only changes made were names and new addresses listed on the documents already provided. Other than those, there have been none.

INTERROGATORY NO. 3: List and identify by name, address and telephone number all persons who have served as so-called "committee members" for you in connection with the sale and assignment of interests in litigation pursued by you relating to the Spindletop heirs.

**ANSWER**: We do not have "so-called" committee members. Actual committee members information are attached.

INTERROGATORY NO. 4: Have you contracted or entered into any agreement (whether oral or written) with any person(s) to solicit investors on your behalf since June 7, 2007? If your answer is "Yes," list and identify by name, address and telephone number all such persons, and state the nature and amount of compensation paid or to be paid to such persons for their services.

ANSWER: No.

<u>INTERROGATORY NO. 5</u>: Do you know who Belva Woods is, and if so, what is her relationship with you?

ANSWER: Belva Woods is an interest holder and holds 4 separate purchases of Sale and Assignments before there was any cut-off date. Those are Record #N671-381B for 2.00%, Record #4438ES49 for .05% interest, record # 4438E437 for .01% interest and

Record #4438E551 for .05% interest. See attached a copy of Belva Woods' response letter to the Texas State Securities Board.

INTERROGATORY NO. 6: Identify by payor, date, amount, and method of payment all sums received by you since June 7, 2007 in connection with the sale and assignment or acquisition of interests by any third persons in litigation pursued by you relating to the Spindletop heirs. If you have not received any such sums, you must so state in your sworn answer.

ANSWER: None.

INTERROGATORY NO. 7: State whether you have recovered, secured, received or obtained any monies or payments from any litigation pursued by you relating to the Spindletop Heirs since June 7, 2007? If your answer is in the affirmative, please identify the specific litigation from which the payment was received, the amount of the payment, the date of the payment and where the money is being held. If payment has not yet been received but is scheduled to be made, identify the source and scheduled date of payment.

ANSWER: None.

INTERROGATORY NO. 8: List and identify by parties' names, case number and jurisdiction all lawsuits in which you are or have pursued a monetary recovery or judgment in relating to the Spindletop Heirs. For each such action identified, state whether any judgment has been obtained by you and in what amount.

ANSWER: All Spindletop related cases were filed in Jefferson County, Texas.

These cases were only for the heirs of James Meaders of Dallas. These cases were not just for minerals from the Spindletop Oil Field, but included a large amount of other tracts of land located in Jefferson County.

Jewell Robbins et al v. Benchmark Oil & Gas Co., et all 136<sup>th</sup> District Court of Texas – Jefferson County, Texas Cause # Dddd-124-881 No Judgment

Jewell Robbins et al v. Amoco Production Co., et al US District Court for Eastern District of Texas Cause # B-85-251-CA
No Judgment

Jewell Robbins et al vs. Amoco Production Co., et al Civil Action # A-9421 No Judgment

Jewell Robbins et al vs. Amoco Production Co. et al Court of Appeals two times – 5<sup>th</sup> Circuit and the Supreme Court Cause #86-2111 No Judgment

Jewell Robbins et al vs. HNG Oil Co. et al Court of Appeals, Texas 9<sup>th</sup> District Cause # 09-93-00107 CV - Trial Court # D-124881-A No Judgment

INTERROGATORY NO. 9: List and identify by payee, date and amount any and all expenditures you have made to any person or entity in your pursuit of a monetary recovery or judgment relating to the Spindletop Heirs.

ANSWER: Objection. This request is overbroad and covers periods going back to 1985. Since June, 2007, I have not paid any funds to anyone for pursuit of a monetary recovery or judgment relating to the Spindletop Heirs.

RONALD D. BOWLING

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## **VERIFICATION**

I have read the foregoing Answers and the facts stated therein are true and correct to the best of my knowledge and belief.

Januer Robbins

STATE OF KENTUCKY)

SS

COUNTY OF FAYETTE)

SUBSCRIBED, sworn to and acknowledged before me on this, 45 day of March, 2008, by Jewell Robbins.

My Commission Expires 6 - 16 - 69

NOTARY PUBLIC, STATE AT LARGE,

KENTUCKY

## **CERTIFICATE OF SERVICE**

I hereby certify that the foregoing was served by mailing a true copy of same to Hon. William B. Owsley, Office of General Counsel, Office of Financial Institutions, 1025 Capital Center Drive, Suite 200, Frankfort, Kentucky 40601, on this 25 haday of March, 2008.

RONALD D BOWLING